

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Owens-Illinois, Inc.
2481 Brookside Road
Lapel, Indiana 46051

ATTENTION:

Richard Meadows
Environmental Health and Safety Manager
richard.meadows@O-I.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Owens-Illinois, Inc. (O-I or you) to submit certain information about the facility at 2481 Brookside Road, Lapel, Indiana.

Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within the schedules provided in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

O-I owns and operates an emission source at the Lapel, Indiana facility. We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan, applicable CAA regulations, and the National Ambient Air Quality Standards.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask O-I to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Daniel Schaufelberger at schaufelberger.daniel@epa.gov or 312-886-6814 to make arrangements to submit your response.

O-I must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject O-I to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Daniel Schaufelberger at (312) 886-6814 or schaufelberger.daniel@epa.gov. An additional contact is Brittany Cobb, who can be reached at (312) 353-1248 or cobb.brittany@epa.gov.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents or ESI responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to the response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this request for information will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.* Reference is made to EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions, when appropriate. Definitional clarification is specified below.

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Owens-Illinois, Inc. (O-I) must submit the following information requested for its facility located at 2481 Brookside Road, Lapel, Indiana (the Facility), pursuant to Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. Section 7414(a), in accordance with the following schedule:

Part I: Within **20 calendar days** of the receipt of this request, O-I must respond to the questions in Part I.

Part II: Within **60 calendar days** of the receipt of this request, O-I must perform the stack testing specified in Part II. Within **30 calendar days** after completion of those tests, O-I must submit the complete results to EPA. Note that, as detailed in Paragraph 6 of Part II, O-I must submit a notification of the intent to test **30 calendar days** before testing is to occur.

Part I

1. For O-I's Furnace #32 and Furnace #6, provide the following *daily* records (in Microsoft Excel format) from the January 1, 2015 to the present:
 - a. Natural Gas Consumption (MMBtu);
 - b. Amount of glass pulled (tons);
 - c. Average percent sulfur in raw materials (wt%);
 - d. Electric boost consumption (kW); and
 - e. Average percent cullet.
2. Provide a list of any and all air emissions tests that occurred at Furnace #32 and Furnace #6 for nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM) including filterable and condensable PM, sulfuric acid mist (H₂SO₄), and carbon monoxide (CO) from January 1, 2015 to the present. Emissions testing includes, but is not limited to compliance testing, engineering testing, and testing for general information. Also provide a copy of any report that resulted from the emission tests which meet the above criteria. Indicate whether such report was shared with the local and/or state permitting agency. A copy of the summary pages from each report is sufficient so long as the summary provides emission rates as well as all the operating parameters recorded during the tests including, but not limited to, the electric boost usage (kW), fuel usage (MMBtu/hr), glass pull rate (tons/hr), raw materials composition and feed rate (lb/hr), weight percent sulfur in raw material mix (wt%), color/type of glass, bridgewall temperature (degrees F), oxygen flow rate (dscf/min), purity of oxygen, air flow rate (dscf/min), air/fuel ratio, and percent cullet usage.

Part II

3. Conduct stack performance testing in accordance with EPA Reference Methods 1-4 (stack gas characteristics), Method 6 or 6C (sulfur dioxide), Method 7 or 7E (nitrogen oxides), and Methods 5 and 202 (filterable PM and condensable PM) for three one-hour tests at Furnace #32 and Furnace #6 exhaust stacks.
4. During testing, O-I shall operate each furnace at the highest daily glass pull-rate achieved during its current furnace campaign. The operating parameters (*See* list in Paragraph 5, below) should match, as closely as possible, the daily average conditions that occurred during the highest glass pull-rate day(s), consistent with representative conditions as described in EPA Stack Testing Guidance.¹
5. As part of the performance testing, the following process information for each furnace should be recorded and submitted to EPA in the test report outlined in Paragraph 7 below:
 - a. Glass pull-rate (tons/hour);
 - b. Electric boost level (kW);
 - c. Natural gas usage rate (MMBtu/hr);
 - d. Percent cullet usage and;
 - e. Percent sulfur in raw material mix (wt%).
6. Notify EPA of the intent to test no later than **30 calendar days** prior to testing. Notification must include the scheduled testing date and a proposed testing protocol that fully describes the methods, planned operating parameters (*See* list in Paragraph 5, above), and procedures for testing. The protocol shall address the requirements of this information request. O-I must conduct the testing under a protocol approved in advance by EPA.
7. Submit a complete report of the emissions testing at the facility within **30 calendar days** of completion of the tests. The report shall include the following, at a minimum:
 - a. Summary of Results
 - i. Results of the emission tests in pounds per hour and pounds per ton of glass pulled;
 - ii. Process data related to determination of compliance;
 - iii. Discussion of test errors;
 - iv. Discussion of any deviations from the reference test methods; and
 - v. Production and feed rate data during the tests.
 - b. Facility Operations
 - i. Description of the process operation; and

¹ Tests should be performed under conditions that represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and that are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. Clean Air Act National Container Stack Testing Guidance, § VII.5 (April 27, 2009), available at https://www.epa.gov/sites/default/files/2013-09/documents/stacktesting_1.pdf

- ii. Hourly operating data for the day(s) of the tests.
- c. Sampling and Analytical Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Sampling point description, including labeling system;
 - iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - vii. Quality control/quality assurance procedures, tests and results.
- d. Appendix
 - i. Documentation of all calculations;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report(s), with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by plant representative;
 - vi. Test log;
 - vii. Project participants and titles; and
 - viii. Related correspondence.

Standard bcc's:

Official File Copy w/Attachment (s)

Originating Organization Reading File w/Attachment(s)

Other bcc's: